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ABSTRACT

Assignment of teachers to teach subjects for which they have not had academic preparation is a topic of considerable concern presently. This paper: (1) reviews present Colorado provisions regarding teacher subject eligibility and assignment; (2) reports available data as to the extent of teaching without academic preparation; (3) identifies alternative standards for eligibility to teach a subject; and (4) identifies alternative means for monitoring compliance with standards. (JD)

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TEACHING WITHOUT SUBJECT PREPARATION

May 1986

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CONTROLS ON TEACHING WITHOUT ADEQUATE SUBJECT AREA PREPARATION IN COLORADO SCHOOLS

Issue Paper

May 1986

Prepared by Howard Brown

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EXECUTIVE SUMMARY

Assignment of teachers to teach subjects for which they have not had adequate academic preparation is a topic of considerable concern presently. Colorado certification rules do not presently require preparation in a subject in order to teach it. Colorado accreditation rules require high school teachers to have 20 hours preparation to teach subjects, but audits indicate that approximately 8 percent do not. There is no requirement for subject preparation for junior high school teachers. Possible alternatives include requiring teachers to spend half their time teaching in their endorsement area and extending the 20-hour accreditation requirement to junior high schools.

Monitoring of subject preparation is now accomplished through once every three years accreditation audits. One alternative monitoring scheme would record with certification those subjects for which a teacher meets the 20-hour standard. This would allow computer checks against assignments. Other alternatives include checking credentials of all new hires and reassignments, requiring district reporting or public disclosure, and beefing up the audit process.

CONTROLS ON TEACHING WITHOUT ADEQUATE SUBJECT AREA PREPARATION IN COLORADO SCHOOLS

Assignment of teachers to teach subjects for which they have not had academic preparation is a topic of considerable concern presently. This paper (1) reviews present Colorado provisions regarding teacher subject eligibility and assignment, (2) reports available data as to the extent of teaching without academic preparation, (3) identifies alternative standards for eligibility to teach a subject, and (4) identifies alternative means for monitoring compliance with standards.

Existing Provisions Regarding the Assignment of Teachers

Colorado Law

Colorado law on teacher certification empowers the State Board of Education to cause teaching certificates to be endorsed as to grade level and subject area appropriate to the applicant's preparation, training or experience [22-60-109].

Colorado law also directs the State Board of Education to adopt rules and regulations prescribing standards for appropriate endorsements for certificates and letters of authorization [22-2-109(h)].

Certification Rules

The Colorado Code of Regulations stipulates that teaching certificates and letters of authorization shall be endorsed based upon recommendations by accepted institutions of higher education. Specific endorsement areas are set forth and necessary areas of study are specified within the regulations. Specifications are also given for teachers holding either an elementary or secondary endorsement and seeking to add the other as a second endorsement [2260-R-5, 2260-R-6, 2260-R-102(2)]. (A compilation of pertinent rules is attached.)

The rules specify that letters of authorization are only valid for their specified endorsement [2260-R-3.00]. No such stipulation is made for certificates. Rules had been in effect during the 1976 to 1978 period stipulating that the major part of a teacher's assignment (interpreted as more than 50 percent) had to be in his or her endorsement area. This provision was repealed, however, because of resulting problems for local school districts, leaving no certification requirement that teachers must teach in their area of endorsement.

Accreditation Rules

In the absence of certification-based stipulations in regard to teaching outside one's area of endorsement, the enforcement of adequate preparation in the subject area falls upon the school accreditation process. Accreditation rules require all teachers to be fully certificated, precluding salary payment otherwise. Districts are directed to assign teachers to grade levels, fields and subjects in accordance with their academic transcripts, previous experience and Colorado teaching certificate [2202-R-3.11, 3.12].

Specifically, elementary teachers are to be endorsed in either elementary or early childhood education. Middle and junior high school teachers may have elementary, middle school or secondary endorsements. If one-half or more of their assignment is in a single subject area, they are to "have the necessary preparation to effectively fulfill the assignment." High school teachers are to have at least 20 semester hours of preparation for their fields and specific preparation (probably interpreted as at least one course) for each specific subject which they teach.

The accreditation requirements for high school teachers are less rigorous than if teachers were required to be endorsed in their subject area. Endorsement requires a major in the field, methods classes and student teaching in that field, and courses in specified subject areas depending upon the endorsement area. A major in a field will require different numbers of hours at various colleges and universities but will usually be more than 20 hours. Colorado teaching certificates presently list only actual endorsements. The certificates do not identify other subjects for which a teacher qualifies to teach (meets the 20-hour accreditation rule) as is done in some states.

Accreditation Enforcement

The Colorado Code of Regulations requires school districts to report annually to the State Board of Education on their compliance with accreditation rules [2202-R-3.09(1)(e)]. Previous forms (CDE-136) simply asked districts to check "yes" or "needs assistance" in regard to: "The professional staff hold certificates appropriately endorsed for their respective positions." Plans for next year are to eliminate this form and to ask the districts to submit to the Board a copy of their annual report to the public instead. This would not likely address the issue of teaching out of endorsement or accreditation prescriptions.

The Rules also call for onsite visits by CDE to each district at least every three years to, among other things, determine compliance with accreditation requirements [2202-R-4.01(2)]. The 20 semester hours of preparation in the field and specific preparation in the subject requirements were not previously a focus of the onsite audits. Effective September 1, 1985, however, all personnel are checked for current certification. Depending on district size, all transcripts or all transcripts for one high school are checked to determine compliance with the 20 hours in the field accreditation criteria. If a district is found to be out of compliance, a plan to correct the situation is requested within 30 days. Annual variances can be granted on a case-by-case basis, but they have been very limited. With this process, all districts would receive at least basic review over a three-year period.

Extent of the Problem

Accreditation Audit Results

Since starting to examine teacher preparation in subject area in September 1985, CDE accreditation audits have visited just over one quarter of Colorado school districts. Accreditation violations were found for those districts as follows (percentage of districts with one or more violations):

21 percent	Staff without valid certification
34 percent	Substitute teachers without valid certification
23 percent	Elementary teachers without elementary certification
15 percent	Administrators without appropriate certification
47 percent	High school teachers without 20 hours in field
55 percent	Teachers not meeting accreditation standards (20 hours or appropriate certificate)

In terms of numbers of teachers, one out of 200 was found not to have valid certification. These include teachers who simply have not applied for recertification, as well as those who have not fulfilled the requirements for certification or recertification. The frequent response of districts is to seek type III (emergency) letters of authorization for these teachers. This would indicate that letters of authorization are being utilized for teachers who have not complied with certification requirements rather than for the intended situation of districts unable to find a qualified teacher, and may be covering up some certification problems. Determinations have not yet been made as to whether teachers obtaining recertification or emergency letters of authorization following an audit have the 20 hours of preparation in their fields to meet accreditation standards.

Certificate and transcript review found 3 percent of teachers not having the appropriate certificate or 20 hours in their teaching field to meet accreditation standards. This figure does not fully represent the extent of high school teachers with fewer than 20 hours in their subject, since for smaller districts, elementary and junior high teachers were also examined. Counting high school teachers only would yield a figure of about 8 percent with fewer than 20 hours preparation in their field.

Opinion Survey

In the 1986 CDE Teacher Opinion Survey, Colorado teachers were asked: "To your knowledge are there classes being taught in your schools by teachers without certification appropriate to the subject area of the class?" Nineteen percent of elementary teachers thought this was the situation at their school, 54 percent of middle school and junior high teachers thought this was the case, and 37 percent of the high school teachers felt this situation existed at their school.

Needs Assessment Survey

As part of a needs assessment for Education for Economic Security Act programs, Colorado school districts were surveyed about their math, science, computer and foreign language programs. Data from 80 percent of Colorado public school districts yielded the following (fewer than six courses could be considered roughly equivalent to fewer than 20 hours):

	No Major or Minor in Field	Fewer than Four Courses in Field	Fewer than Six Courses in Field
Mathematics			
Senior high	10%	8%	19%
Middle/junior high	19%	23%	45%
Science			
Senior high	8%	7%	18%
Middle/junior high	14%	15%	42%
Computers			
Senior high	47%	22%	56%
Middle/junior high	73%	70%	88%
Foreign Language			
Senior high	18%	17%	40%
Middle/junior high	11%	32%	59%

First- and Third-Year Survey

The 1985 CDE survey of first- and third-year Colorado teachers asked the approximate percent of time of their teaching assignment that was in their subject areas of endorsement. Responses were as follows:

Percentage of Time in Endorsement Area	First- and Third-Year Teacher Responses
100%	75%
75%	12%
50%	6%
25%	2%
0%	5%

These responses indicated a slightly greater percentage of time out of endorsement area than the same question asked the previous year. Teachers were not asked about the 20-hour accreditation standard.

National Data

A survey of states conducted by the Council for Better Education and the American Federation of Teachers found little data available; but from those states where it was available, there was an indication that the problem could be quite extensive in certain subject areas. Utah reported teachers not having college majors or minors in their major teaching assignment as follows:

Earth/Space Science	82%
General Science	76%
Physical Science	43%
Mathematics	28%
Biology	25%

Virginia, where districts might have been reluctant to reveal the extent of the situation because it could hurt their accreditation, reported teachers without endorsement for classes as follows:

Earth Science	34%
General Science	34%
Russian	17%
Physics	17%
English	9%
Social Studies	8%

Policy Analysis: Alternatives to Present Requirements

Elementary

At the elementary school level the present criteria is endorsement in elementary or early childhood education. Criteria for obtaining elementary endorsement are being changed to require subject area rather than education majors, but there has been no indication of dissatisfaction with this requirement of elementary endorsement.

High School

At the high school level, the present Colorado criteria is that of accreditation: 20 hours of academic preparation in the field, including a course in the particular subject being taught. While each state is different, as reported by the Council for Basic Education-American Federation of Teachers (CBE-AFT) survey, the 50 states could be grouped as follows:

Basically firm requirement of endorsement to teach a subject	12 states
Firm requirement but exceptions allowed	5 states
State in process of strengthening requirements	5 states
Lesser standard (often 18-20 hours) allowed (including Colorado)	9 states
Teaching part of the day outside endorsement area allowed	13 states
No restrictions	6 states

Any of these examples could be used as a model. Potentially appropriate as models for Colorado might be those states which require endorsement to teach a subject but allow exceptions on a justfied request. Another more rigorous policy option would be to (1) reinstate the rule that had been in effect from 1976 to 1978 which stipulated that the major portion of a teacher's assignment had to be in their endorsement area, (2) maintain the 20-hour accreditation standard outside endorsement areas, and (3) allow for variances. Most of the states which do allow teaching part of the day outside the endorsement area have few if any requirements for preparation for the outside classes.

A more flexible policy alternative would be to allow the option of using some sort of subject competency test to substitute for the 20-hour requirement (or endorsement if required). Any change in preparation requirements would necessitate changes in accreditation or certification rules.

Junior High/Middle

There is presently no effective subject preparation criteria in Colorado for junior high and middle schools. Teachers with one-half or more of their assignment in a subject are supposed to "have the necessary preparation to effectively fulfill the assignment," but otherwise may have any endorsement and have no required number of hours of academic preparation in the field. The extent of teachers not having preparation for the field they are teaching in is likely greatest at this level, but would not violate certification or accreditation rules. Colorado apparently is not alone in its treatment of junior high and middle schools. The CBE-AFT survey refers to them as a "no-man's-land" in regard to out-of-field assignment of teachers. The North Central Association does require junior high teachers with secondary certificates to have 18 hours in the field, and those with elementary certificates to have 12; but only 30 percent of Colorado's junior high/middle schools are members. One alternative would be to apply the high school standard to junior high schools. (It might not be as appropriate to middle schools with a more interdisciplinary approach.) This could be modified by applying a somewhat lesser standard such as 12 or 15 hours in subject field and/or limiting application to eighth or ninth grade level classes. (Ninth grade teachers now must have 20 hours if teaching in a high school, but those teaching in a junior high do not.)

Policy Analysis: Alternative Monitoring Approaches

Public Disclosure of Misassignments

Since the Colorado Code of Regulations requires districts to report annually to the state board on their compliance with accreditation rules, and, since that report is being replaced by annual reports to the public, it might be appropriate to require that those reports to the public state any teachers assigned to teach subjects for which they do not have 20 hours of preparation. Current plans for the annual reports do not require such a statement on compliance with accreditation standards. Kentucky has incorporated public disclosure of misassignment into its enforcement process and feels that it has been quite effective.

More Rigorous Onsite Audits

It is probably too early to judge the effectiveness of the current monitoring system based on onsite audits every third year, since the 20-hour requirement has only been monitored for seven months. One policy option would be to increase audit team personnel/resources and direct added emphasis on compliance with accreditation standards for preparation in a teaching field. According to the CBE-AFT survey, six states employ audits as a means of monitoring compliance with accreditation or endorsement criteria.

Reliance on NCA Accreditation

One alternative suggested by school districts and being considered by the Field Services Unit would be to consider the review of the North Central Association (NCA) accreditation process to be adequate for determining compliance with assignment criteria for member schools. This would cover approximately 60 percent of Colorado high schools and 30 percent of junior high schools. The North Central Association accreditation rules identify 20 teaching fields. Except for mathematics, health, physical education and industrial arts which require 20 hours, the NCA requires 24 hours of preparation in the field rather than 20 hours as in CDE accreditation rules. In a few fields, however, the NCA requirements are less specific than those for state accreditation. The North Central Association reviews every transcript when a district applies for membership. They also review transcripts for every new teacher, but do not presently review reassignments which accounts for many of the situations of teaching without adequate preparation in the field.

Computer Checks

The most frequently utilized monitoring mechanism (14 states), according to the CBE-AFT survey, is to compare annual submissions of teaching assignments with state records of endorsements. Plans are already under way to do this in Colorado. Since CDE data storage should accommodate this readily, it could be implemented in the fall of 1986. This should be quite effective for elementary assignments where endorsements are the criteria. For high schools, however, this would only be an indicator of potential problems, since according to current rules, endorsement is not necessary if the 20-hour criteria is met.

The way to make such a computer check effective for high schools would be to list on teaching certificates (and in data files) not only the endorsement area, but also any other subject areas in which a teacher is eligible to teach in accordance with accreditation rules. Then, if assignments are compared to certification files, as is planned, a direct listing of teachers who do not meet accreditation requirements for a teaching assignment would result. This might entail a lot of work if transcripts were reviewed for all certification files, but could alternatively be phased in with all new certificates and renewals.

Immediate implementation would probably require a special staff assignment or outside contract and could conceivably be completed in time for fall 1986 assignment submissions, but fall 1987 would be more likely. First priority could be placed on teachers with assignments outside their endorsement area as identified by computer check. There would be a significant load for the first year or so as teachers update their files to become eligible to teach other subjects. If phased in with new certificates and renewals, approximately one-third of the certificates could be updated during 1986-87 and be ready for fall 1987, and four additional years would be necessary to achieve full coverage. (Most certificates are now valid for five years, and the number of new certificates is about equal to the number of renewals each year.) Phasing in with new certificates and renewals would allow incorporaton into the regular certification process but would probably require adding at least one staff person to that area. Asking applicants what fields they feel they are eligible to teach might speed up the process.

Check of New Hires and Assignment Changes

An alternative approach would be to identify all new hires and changes of assignment when certificated personnel files are updated annually. This could be built into the updating program. These names could then be checked against endorsements and transcripts. In the short run, this would examine the cases most likely to have problems with inadequate subject preparation, and, in the long run, this would provide full coverage. This could be initiated with fall 1986 assignment submissions, but would require sizable effort (perhaps one to two man-months) to check transcripts (high school only). If the extra effort were taken as transcripts were reviewed to note on certification files those additional subjects which could be taught within accreditation guidelines, this approach could also eventually provide the necessary data for an automatic computer check system.

District Reporting

One other possibility would be to require each district to report what subjects teachers are eligibile to teach along with annual submissions of what subjects they will teach. The CBE-AFT survey found this to be the practice in nine states. In Colorado, however, since teacher subject eligibility may be different than endorsement, this would require review of transcripts in the context of accreditation rules. Consequently, it might place a significant burden on districts in terms of reviewing transcripts and in terms of making judgments as to their own accreditation compliance. Because of the necessity for DARU form clearance, this sort of system could probably not be implemented until the fall of 1987.

CURRENT REQUIREMENTS FOR TEACHING ASSIGNMENTS

Elementary Schools

Colorado Accreditation Rules

3.12 (4) Schools designated as elementary schools shall be staffed by teachers who hold certificates which are appropriately endorsed for early childhood or elementary education.

North Central Association Accreditation Rules

4.01 Teachers. All elementary teachers shall hold a baccalaureate degree from a regionally accredited institution and shall meet the regular elementary certification standards of the state for their specific assignment.

Junior High/Middle Schools

Colorado Accreditation Rules

3.12 (5) Schools designated as middle or junior high schools shall be staffed by teachers with elementary, middle school or secondary endorsements. Teachers with one-half or more of their assignment in a subject area shall have the necessary preparation to effectively fulfill the assignment.

North Central Association Accreditation Rules

6.6 All professional personnel shall hold a baccalaureate degree from a regionally accredited institution, evidence adequate professional education preparation, meet the regular certification standards of the state, and shall be assigned to teach in areas for which they are prepared.

a. Teachers with preparation and certification for junior high or middle schools may teach all subjects and levels for which their certificates are endorsed, subject to the approval of the State Committee.

b. Teachers with secondary certification shall have 18 semester hours (16 semester hours in mathematics) in the field, appropriately distributed subject to the approval of the State Committee.

c. Teachers with elementary certification shall have 12 semester hours in the field, appropriately distributed and subject to the approval of the State Committee.

d. Teachers with elementary certification may teach all subjects in a self-contained classroom.

e. Teachers of combined subject classes shall have at least 24 semester hours of appropriately distributed credit in the included subject fields.

High Schools

Colorado Accreditation Rules

3.12 (6) (a) Field Preparation: Senior high teachers shall have a minimum of 20 semester hours of preparation in each field in which they teach, except in those fields where state requirements specify an endorsement or a different level of preparation.

3.12 (6) (b) Subject Preparation: Senior high teachers shall have specific preparation in each subject to which they are assigned.

North Central Association Accreditation Rules

4.10 Degree and Legal Standards: Teachers shall hold a baccalaureate degree from an institution accredited by a regional accrediting association and shall meet the legal standards for teachers in the state in which they are employed.

Teachers in the following fields shall have the minimum number of semester hours of credit hereinafter prescribed in order to qualify for teaching assignments in their respective fields.

A teacher may qualify to teach a certain subject by taking and passing a proficiency examination provided an accredited college certifies that the teacher has demonstrated competency equal to that attained by completion of the required preparation.

. . . (19 teaching fields are listed and preparation stipulated, generally 24 hours in the subject area) . . .

4.59 All Other Subjects: Teachers of all other subjects for which NCA requirements have not been established shall be approved by the Commission provided they hold a certificate for the specific field issued by the state in which they are teaching. In the absence of such state certification, approval shall be determined by the judgment of the State Committee.